

**William X Nietzsche
Julie Metcalf Kinney
c/o 4406 N Mississippi Avenue
Portland, Oregon [97217]
503-287-6494**

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

FILED 30 APR '19 16:24 USDC-ORP

**William X Nietzsche (solely as trustee for
KRME International Trust),**

Et al.,

3:18-CV-01930-SI

Plaintiff/Petitioner,

Case No.

**PLAINTIFF'S MOTION FOR
DEFAULT JUDGMENT AGAINST
BARRISTER SUPPORT SERVICES
(PURSUANT TO FRCP RULE 55)**

v.

FREEDOM MORTGAGE CORPORATION (FMC),

Et al.,

Defendant(s)/Respondent(s)

PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT

Plaintiff William and Julie Kinney ("The Kinney's"), by and through Plaintiff/trustee William X Nietzsche, hereby moves this Court of Record to enter an order for Default Judgment against defendant Barrister Support Services, stating in support:

1. On April 5, 2019, defendant Barrister Support Services received a copy of plaintiff's First Amended Verified Complaint.
2. Defendant Barrister Support Services had 21 days to file a response to the summons and Verified Complaint.
3. As of this date defendant Barrister Support Services has failed to file any response to the original summons and Verified Complaint filed November 5, 2018.
4. As of this date defendant Barrister Support Services has failed to file any response to the First Amended Verified Complaint filed April 2, 2019.

5. The Return of Service affidavit signed by Darnell Tellis is in the file showing date of service of plaintiff's summons and Verified Complaint served upon defendant Barrister Support Services.
6. The Return of Service affidavit signed by Darnell Tellis is in the file showing date of service of plaintiff's First Amended Verified Complaint upon defendant Barrister Support Services.
7. The interest of justice and of the orderly administration of this court should result in entry of Default Judgment against defendant Barrister Support Services forthwith.

WHEREFORE, Plaintiffs move this Honorable Court of Record to enter an order for Default Judgment against defendant Barrister Support Services.

RESPECTFULLY DATED this 30 day of April, 2019.

By JAM Kinney All Rights Reserved
Julie Ann Metcalf Kinney
In Solo Proprio, In Proper Persona,
Sui Heredes, Sui Juris [Pro se]

By William X Nietzsche
William X Nietzsche, as trustee for KRME International Trust
In Solo Proprio, In Proper Persona,
Sui Heredes, Sui Juris [Pro se]